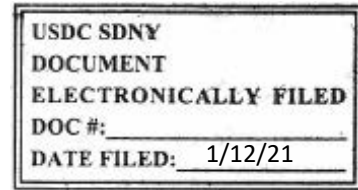




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December 29, 2020



VIA ECF

The Honorable Alison J. Nathan
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 906
New York, NY 10007

Re: **LRN Corp. v. Markel Ins. Co., No. 1:20-cv-8431-AJN**

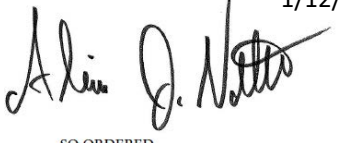
Dear Judge Nathan,

We are counsel for Defendant Markel Insurance Company ("MIC") in the above-referenced matter. We write pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Rules 7.1(d) and 5.2(b) of the Local Rules for the Southern District of New York, and Rules 1.A. and 1.D. of Your Honor's Individual Practices, to respectfully request that the deadline for Defendants MIC and Arch Insurance Company ("Arch") (collectively, "Defendants") to answer or otherwise respond to Plaintiff's complaint (ECF No. 1) be extended through and including February 1, 2021.

MIC's original response date is December 31, 2020 and Arch's original response date is January 8, 2021. Plaintiff is not objecting to extension, which will help ensure a common and efficient case schedule. No Defendant has previously requested an extension of the time to respond to this action. This extension will allow the Defendants and their counsel additional time to investigate the facts surrounding Plaintiff's claims and to prepare a response to the Complaint.

The Defendants also respectfully request that the Court adjourn the initial scheduling conference until after the responsive pleadings by the Defendants are filed, in order to preserve party and judicial resources. The initial scheduling conference is currently scheduled for January 29, 2021. Pursuant to Your Honor's Individual Practices, the parties submit the following three mutually agreed upon dates for the conference:

1. March 5, 2021
2. March 12, 2021
3. March 19, 2021


1/12/21
SO ORDERED.
ALISON J. NATHAN, U.S.D.J.

Defendants' request for an extension of time to respond to the Complaint until February 1, 2021 is hereby GRANTED. The initial pretrial conference is hereby adjourned to March 12, 2021 at 3:00 p.m.
SO ORDERED.

The Hon. Alison J. Nathan

December 29, 2020

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Thank you for your consideration.

Respectfully submitted,

/s/Michael R. Delhagen

Michael R. Delhagen

cc: All counsel of record (by ECF)